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September 27, 2005

Ref: 4181-23181

Honorable James H. Welsh Commissioner of Conservation Office of Conservation P. O. Box 94275 Baton Rouge, LA 70804-4275

Re:

Emergency Hearing Application
18,800' Tuscaloosa Sand, Reservoir C

MORGANZA FIELD, Pointe Coupee Parish, Louisiana Applicant: Pennington Oil & Gas Interests, LLC

Dear Mr. Commissioner:

Application is hereby made on behalf of Pennington Oil & Gas Interests, LLC for the calling of a public hearing, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the 18,800' Tuscaloosa Sand, Reservoir C in the Morganza Field, Pointe Coupee Parish, Louisiana.

- To create three (3) single drilling and production units for the 18800' Tuscaloosa Sand, Reservoir C designated as the 18800 TUSC RC SUA, 18800 TUSC RC SUB and TUSC RC SUC, Morganza Field, Plaquemines Parish, Louisiana, all as shown more particularly on the attached plat.
- 2. To establish rules and regulations governing the exploration for and production of gas and condensate from the said units.
- 3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the units so created, with each tract sharing in unit production on a surface acreage basis of participation.
- 4. To designate a unit operator and unit well for the units created herein.
- 5. To provide that the Commissioner of Conservation should be authorized to reclassify the reservoir by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.
- 6. To consider such other matters relating to the subject reservoir as may be appropriate and justified by the evidence presented at the public hearing.

The 18,800' Tuscaloosa Sand, Reservoir C, in the Morganza Field is hereby defined as being that gas and condensate bearing sand encountered between the measured depths of 18,844 feet and 18,930 feet (electrical log measurements) in the BP America Production Co. (Amoco)-Dorothy Brown No. 2 Well, located in Section 56, Township 4 South Range 8 East, Pointe Coupee Parish, Louisiana and is further defined as being that gas and condensate bearing sand encountered between the measured depths of 18,772 feet and 18,860 feet (electrical log measurements) in the BP America Production Co. (Amoco) F&L Planters No. 4 Well, located in Section 76, Township 4 South, Range 8 East, Pointe Coupee Parish, Louisiana and is further defined as being that gas and condensate bearing sand encountered between the measured depths of 20,090 feet and 20,300 feet (electrical log measurements)

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in the Pennington Oil & Gas Interests, LLC-Lichtenberg No. 1 Well located in Section 45, Township 4 South, Range 4 East, Pointe Coupee Parish, Louisiana.

The exterior geographic boundaries of the proposed 18,800 TUSC RC SUA, SUB and SUC are identical to the exterior geographic boundaries of the existing 17,900 TUSC RA SUBB, SUCC and SUU. This application is intended to only have effect if a redefinition of the 17,900' Tuscaloosa Sand scheduled for public hearing on November 1, 2005 under Docket No. 05-1156 is granted for the entire 17,900' Reservoir A.

The Commissioner of Conservation has waived the twenty (20) day pre-application notice requirement provided for in Rule 3 of the Rules of Procedure for Conducting hearings before the Commissioner of Conservation and that rule is not applicable to this hearing application.

A conference to discuss this application WILL BE HELD at 10:00 a.m. on Friday, October 7, 2005, in the offices of Gordon, Arata, McCollam, Duplantis & Eagan, LLP, 400 E. Kaliste Saloom Rd., Suite 4200, Lafayette, Louisiana 70508.

Attached hereto and made a part hereof are plats outlining the 18800' RC SUA, SUB and SUC, Morganza Field, Pointe Coupee Parish, Louisiana, and a list of the names and addresses of the interested owners, represented parties and interested parties to whom this notice is being sent. It is hereby certified that a reasonable effort was made to ascertain the names and addresses of all interested owners, represented parties and interested parties.

Upon receipt of the legal notice in the captioned matter, the notice will be posted, published and mailed in accordance with Rule 8 of the Rules of Procedure.

Any pertinent data relating to the proposed unit can be obtained, AT THE COST OF THE REQUESTING PARTY, from Mr. Chip LeBlanc of LeBlanc Geological Services, 3500 N. Causeway Blvd, Metairie, LA 70002 (504) 828-8700.

Finally, there is enclosed herewith our check on behalf of the applicant in the amount of \$755.00, made payable to the Office of Conservation, representing the required hearing application fee.

BJD/ht

cc: Mr. Richard D. Hudson

District Manager, Office of Conservation

All Interested Owners, Represented Parties and Interested Parties

